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U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2011 Grand Jury

UNITED STATES OF AMERICA,) CR 11- 388(A)GAF
)
Plaintiff,) F I R S T
) S U P E R S E D I N G
v.) I N D I C T M E N T
)
YUSUF ABDULLAHI ABAKAR,) [18 U.S.C. § 1621(1): Perjury;
) 18 U.S.C. § 1546(a): Fraud and
Defendant.) Misuse of Visas, Permits, and
) Other Documents]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1621(1)]

On or about August 19, 2009, in Los Angeles County, within the Central District of California, and elsewhere, defendant YUSUF ABDULLAHI ABAKAR ("defendant ABAKAR"), having taken an oath before a competent adjudication officer that he would testify truthfully in a case in which a law of the United States authorizes an oath to be administered, did willfully and contrary to such oath state a material matter that he knew not to be true. Specifically,

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1 defendant ABAKAR stated that his wife, M.W., resided at 4123 Santa
2 Rosalia Drive #A, Los Angeles, California. As defendant ABAKAR
3 then well knew, this statement was false because defendant ABAKAR
4 knew that his wife, M.W., did not reside at 4123 Santa Rosalia
5 Drive #A, Los Angeles, California.

COUNT TWO

[18 U.S.C. § 1621(1)]

On or about August 19, 2009, in Los Angeles County, within the Central District of California, and elsewhere, defendant YUSUF ABDULLAHI ABAKAR ("defendant ABAKAR"), having taken an oath before a competent adjudication officer that he would testify truthfully in a case in which a law of the United States authorizes an oath to be administered, did willfully and contrary to such oath state a material matter that he knew not to be true. Specifically, defendant ABAKAR denied that he had ever given false or misleading information to a U.S. government immigration official. As defendant ABAKAR then well knew, this denial was false because defendant ABAKAR had given false and misleading information to a U.S. government immigration official; namely, on or about March 13, 2006, he signed under penalty of perjury a Form I-751 (petition to remove the conditions on residence) that falsely stated that he and his wife, M.W., resided at 4123 Santa Rosalia Drive #A, Los Angeles, California, when in fact, as defendant ABAKAR then well knew, his wife, M.W., did not reside at 4123 Santa Rosalia Drive #A, Los Angeles, California.

COUNT THREE

[18 U.S.C. § 1546(a)]

On or about March 28, 2007, in Los Angeles County, within the Central District of California, and elsewhere, defendant YUSUF ABDULLAHI ABAKAR ("defendant ABAKAR") knowingly made under oath, and as permitted under penalty of perjury under section 1746 of title 28, United States Code, knowingly subscribed as true, a false statement with respect to a material fact in an application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and knowingly presented such application, affidavit, and other document which contained such false statement and which failed to contain any reasonable basis in law or fact. Specifically, on or about March 28, 2007, defendant ABAKAR knowingly signed under penalty of perjury, and subsequently knowingly presented to Citizenship and Immigration Services, a Form N-400 (application for naturalization), that contained a false statement, namely, that defendant ABAKAR's wife, M.W., resided at 4123 Santa Rosalia Drive #A, Los Angeles, California. As defendant ABAKAR then well knew, this statement was false because defendant ABAKAR knew that his wife, M.W., did not reside at 4123 Santa Rosalia Drive #A, Los Angeles, California.

COUNT FOUR

[18 U.S.C. § 1546(a)]

On or about March 28, 2007, in Los Angeles County, within the Central District of California, and elsewhere, defendant YUSUF ABDULLAHI ABAKAR ("defendant ABAKAR") knowingly made under oath, and as permitted under penalty of perjury under section 1746 of title 28, United States Code, knowingly subscribed as true, a false statement with respect to a material fact in an application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and knowingly presented such application, affidavit, and other document which contained such false statement and which failed to contain any reasonable basis in law or fact. Specifically, on or about March 28, 2007, defendant ABAKAR knowingly signed under penalty of perjury and subsequently knowingly presented to Citizenship and Immigration Services ("CIS"), a Form N-400 (application for naturalization), that contained a false statement, namely, defendant ABAKAR's denial that he had ever given false or misleading information to a U.S. government immigration official. As defendant ABAKAR then well knew, this denial was false because defendant ABAKAR knew that he had given false and misleading information to a U.S. government immigration official when, on or about March 13, 2006, he signed under penalty of perjury and subsequently submitted to CIS a Form I-751 (petition to remove the conditions on residence) that falsely stated that he and his wife, M.W., resided at 4123 Santa Rosalia Drive #A, Los Angeles, California.

COUNTS FIVE through SEVEN

[18 U.S.C. § 1546(a)]

On or about the following dates, in Los Angeles County,
within the Central District of California, and elsewhere,
defendant YUSUF ABDULLAHI ABAKAR knowingly used and possessed a
permit and document prescribed by statute and regulation for entry
into and as evidence of authorized stay and employment in the
United States knowing it to have been procured by means of a false

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claim and statement, and to have been otherwise procured by fraud
and unlawfully obtained:

COUNT	DATE	USE/POSSESSION
FIVE	March 29, 2009	Entered the United States at Los Angeles International Airport using/possessing a United States ADIT stamp in his foreign passport
SIX	August 7, 2009	Entered the United States at Los Angeles International Airport using/possessing a United States ADIT stamp in his foreign passport
SEVEN	December 12, 2010	Entered the United States at Los Angeles International Airport using/possessing a United States permanent residency card.

A TRUE BILL

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Foreperson

ANDRÉ BIROTTE JR.
United States Attorney

Donna C. Kim
Dep. Chief, Crim. Div. FOR

ROBERT E. DUGDALE
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